

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

No. **36726**

Mail No. 580 038 872

NOTICE OF VIOLATION

Date of Violation: January 28, 19 99 at _____ m.

Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldback EH&S</u>		
Location of Violation (Address) <u>3801 E Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>AS Above</u>	City, State <u>Seattle, WA.</u>	Zip <u>98134</u>	Phone <u>(206) 623-5596</u> <u>Ext 221</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION _____ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

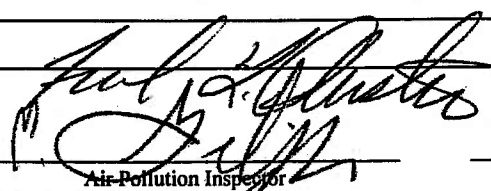
- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☒ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Failure to meet Order of Approval No. 7381, Condition No. 5(b)
- ☐ Section Emissions from the main baghouse are not to exceed 501 ppm NOx
corrected to 10% O₂ for a 24-hour Average
- ☐ Section _____

RECEIVED
APR 20 1999
AGUW-SEATTLE

FACTS ALLEGED TO CONSTITUTE A VIOLATION January 1999 CEM report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By:  Date/Time: 4.19.99 Received By: _____

AGCS2M000526

cc me 4/20

Form No. 70-119 (Revised 12/95 cbc)

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

February 22, 1999

Elizabeth Gilpin
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle WA 98101-2038

Dear Ms. Gilpin:

Re: Notice of Violation # 36726

The following is further information as you requested on the excess NO_x emissions reported in our CEM from January 1999. We hope this is adequate.

NO_x Emissions:

January 28, 1999:

As reported, the kiln was in startup mode, with feed being introduced at 19:30 on 1/27. During the first 24 hours after feed is introduced, it is necessary to keep the kiln slightly hotter than normal stable operating conditions. This is because we are slowly increasing the feed rate. Before any increase, it is necessary to have additional heat already present in the kiln system to be able to handle the increased feed rate. When the nominal feed rate is reached (usually 12-24 hours after first introducing feed), the kiln is stabilized and is running at its optimum efficiency and has the lowest potential of producing excess NO_x. Because the plant was in its startup until 19:30 on 01/07/99, this event should be excused under WAC 173-400-107(4). There was no bypass of control equipment and it could not have been prevented through better planning.

During the startup, other circumstances arose. We were unable to use coal as our primary fuel until 14:00 on 1/28. When the kiln was started, it was found that there was some smoldering coal in our pulverized coal bin. Because of this we were not able to grind any coal until this was put out. The standard procedure for this was followed -- empty the bin and introduce an inert gas (CO₂). At 13:30 on 1/28 it was determined to be safe to grind coal and the mills were started immediately. Coal was introduced as fuel to the kiln soon thereafter. What this all means is that for the first 20 hours after we introduced feed, we were burning gas using a kiln feed that was set up for coal. As has been discussed before it is impossible to make a short term switch in types of feed. It takes several days of raw mill operation to change types of feed.

Sincerely,

J. Trygve Grey
Process Engineer

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038

Fax: 206-343-7522

CERT MAIL 110.2580038 872

Registration No. 11339

Case No. _____

RECEIVED
APR 20 1999
AGUW-SEATTLE

COMPLIANCE STATUS REPORT

Date of Report April 8, 1999 at _____ .m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Gerald Brown EH&S</u>
Location <u>3801 E. Marginal Way SO. Seattle, WA. 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☒ During my inspection I noted the following deficiencies:

The following violations were reported on your January 1998 CEM report:

Date	Pollutant	Reg/Permit Condition
<u>1/6/99</u>	<u>Opacity</u>	<u>Reg I Section 9.04(c)(1) + (2)</u>
<u>1/28/99</u>	<u>Opacity</u>	<u>Reg I Section 9.04(c)(1) + (2)</u>
<u>1/7/99</u>	<u>SO₂</u>	<u>N/C 7381 Condition 5(c)</u>
<u>1/7/99</u>	<u>NOx</u>	<u>N/C 7381 Condition 5(b)</u>

These are not high priority violations. These violations will be processed as such under the 9/10/98 interim policy for CEMs civil penalty policy (i.e. no further enforcement action) which is not Board approved and subject to change.

No response necessary as explanation provided in CEM rep.

Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

Issued by

[Signature]
[Signature]

Received by

Signing this is not an admission of guilt

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

No. **36682**

Cert. Mail No. 580 038 865

NOTICE OF VIOLATION

Date of Violation: December 21, 19 98 at _____ m.

Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldback</u>		
Location of Violation (Address) <u>3801 E. Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>3801 E. Marginal Way So.</u>	City, State <u>Seattle, WA</u>	Zip <u>98134</u>	Phone <u>(206) 623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION _____ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☒ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. 7381, Condition No. 5(b)
- ☐ Section Nox emissions from the main stack shall not exceed 501 ppm
corrected to 10% O₂ for a 24 hr. Ave
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION December Ash Grove Cem Report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

RECEIVED

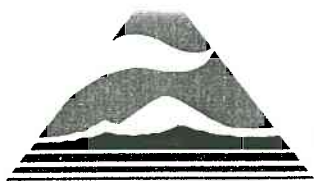
MAR 18 1999

AGUW-SEATTLE

Issued By: [Signature]
Air Pollution Inspector

3-17-99
Date/Time

Received By: _____
Signing this Notice is not an admission of guilt
AGCS2M000529



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

March 31, 1999

Registration No. 11339

Mr. Henrik Voldbaek
Ash Grove Cement Co.
3801 E. Marginal Way S.
Seattle, Washington 98134

*rec'd 4/5/99
mu*

Dear Mr. Voldbaek:

Disposition of Notice of Violation No. 36682

Based on the information you provided to us in your December 1998 CEM report, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case.

This violation did not meet the criteria for a high priority violation (i.e. >15% of the standard for >3% of the operating time).

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,

Elizabeth M. Gilpin

Elizabeth M. Gilpin
Inspector II

EMG:VJD

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Margaret Pageler, City of Seattle, Board Chair
Janet Chalupnik, Member at Large
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton
Dave Somers, Snohomish County Council
Ron Sims, King County Executive

Brian Ebersole, Mayor, Tacoma
Charlotte Garrido, Commissioner, Kitsap County
Doug Sutherland, Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038

(206) 343-8800

(800) 552-3565

FAX: (206) 343-7522

AGOS2M000530

ASH GROVE CEMENT COMPANY



February 18, 1999

"WESTERN REGION"

Elizabeth Gilpin
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle WA 98101-2038

Dear Ms. Gilpin:

Re: Amendments to the December CEM

The following is further information as you requested on the excess emissions reported in our CEM from December 1998.

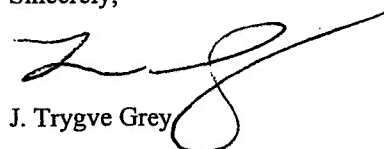
Opacity Emissions:

Much of our Opacity violations had as a contributing factor that one of the reverse air valves had stuck, causing one of the eleven compartments to be blinded off with material. This causes an increased load in the remaining compartments and a higher chance that dust will be pulled through. With our current system, this can only be found by isolating and inspecting all the compartments. The damper can be fixed after this lengthy inspection process. This is what happened for this case. During the planned kiln outage in March, we will be installing "Magnahelics" to monitor the differential pressure of each compartment. This will give us additional trouble shooting capability to determine if a compartment has problems without having to enter each one in succession. Also all the reverse air dampers will be replaced to ensure that they are sealing properly. This is a routine P.M. task and takes place every 3 - 4 years. It will be added into our O & M manual to take and record weekly readings of the "Magnahelics."

NO_x Emissions:

There were several contributing factors to the NO_x emissions on December 20 through December 22. The kiln was started up with feed being introduced at 16:40 on 12/19. During the first 24 hours after feed is introduced, it necessary to keep the kiln slightly hotter than normal stable operating conditions. This is because we are slowly increasing the feed rate and before any increase, it is necessary to have the additional heat already present in the kiln system to be able to handle the increased feed rate. When the nominal feed rate is reached (usually 12 - 24 hours after first introducing feed), the kiln is stabilized and is running at its optimum efficiency and has the lowest potential producing excess NO_x. However in this case, we had to hold the kiln at a lower than normal feed rate because of low kiln feed inventories. With the kiln operating at a low feed rate (120 - 140 tph instead of 150 - 165 tph) the kiln operates less efficiently and produces slightly higher NO_x. As detailed in our November CEM, we had low feed inventory to start the month due to breakdowns of our raw mill in November. Although there were no major breakdowns in December, we had been unable to build inventories the first half of the month because of many small outages. These small outages are typical of the winter months during which the wet weather makes it very hard to handle the raw materials. Although every attempt is made to keep the materials dry, from keeping them stored under cover to drying them under the kiln, we still have problems such as chutes plugging and excessive spilling. While this is usually only a nuisance, the unusually wet weather and the unusually low inventories created more of a problem.

Sincerely,



J. Trygve Grey

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington, 98101-2038
Fax 206-343-7522

Registration No. 11339

Case No. _____

COMPLIANCE STATUS REPORT

Date of Report March 2, 19 99 at _____ m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldback</u>
Location <u>3801 E. Marginal Way So Seattle, WA. 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☐ During my inspection I noted the following deficiencies:

Ash Grove caused or allowed the following violations as reported in the December 1998 CEM Report.

Reg. I 9.09(b)(2) > 5% opacity 1 hr. Ave
on 12/25/98 12/26/98 12/27/98 12/28/98 and
12/29/98 and 12/30/98

12/21/98 NOC 73815(b) > 700 ppm NOx 1 hr. Ave.

Reg. I 9.04(c)(2) > 20% opacity 6 minute in 1 hr.
on 12/26/98 12/27/98 12/28/98 and 12/29/98
and 12/30/98

12/20/98 NOC 73815(b) > 500 ppm NOx 24 hr. Ave.

Please submit a schedule for the installation of the
pressure drop gauges on the 11 baghouse compartments
and the status of the replacement of all of the reverse
air dampers.

Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

RECEIVED
MAR 18 1999

Issued by

Form PS-182

(7/1/93)

Received by

Signing this is not an admission of guilt

AGCW-SEATTLE

AGCS2M000532

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

April 7, 1999

Ms. Elizabeth Gilpin
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA. 98101-2038

Re: Compliance Status Report – March 2, 1999

Dear Ms. Gilpin:

The above requested a schedule for the installation of the pressure drop gauges on the 11 bag house compartments and status of the replacement of the reverse air dampers.

All pressure drop gauges and pressure taps were installed during the March maintenance shutdown period. We are currently awaiting the arrival of connective tubing to complete the project. The installation of these gauges is expected to be complete by April 16, 1999.

The maintenance/replacement of the reverse air dampers is complete. Eight of the eleven dampers were changed during the March maintenance shutdown period. The remaining three were examined but not changed, as they were not warped or cracked.

Should you have any questions please call.

Sincerely,

Gerald J. Brown
Manager, Safety and Environment

cc: HV
MD
TG

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Permit No. 11339
Cert. Mail No. 380 038 842

NOTICE OF VIOLATION

No. **36725**
RECEIVED

Date of Violation: November 3rd, 12th, 27th, 1998

FEB - 4 1999 at 4:00 p.m.

Name <u>H-H Gr. & Cement Co.</u>	Responsible Person, Title <u>Gerald Brown Enviro. Mgr.</u> <div style="text-align: right;">AGCW-SEATTLE</div>		
Location of Violation (Address) <u>3801 E. Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>As Above</u>	City, State <u>Seattle, WA.</u>	Zip <u>98134</u>	Phone <u>206 694-6221</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION _____ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Failure to meet Order of Approval No. 7381, Condition No. 5(b) (11/3/98, 11/12/98, 11/27/98)
- ☐ Section Not to exceed 700 ppm NOx 1 hr Ave main stack. Not to exceed 501 ppm NOx 24 hr Ave main stack (11/3/98, 11/12/98)
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION November 1998 CEM report

CORRECTIVE ACTION ORDER

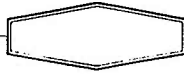
Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Issued By: [Signature]
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 cbc)

2.3.99
Date/Time [Signature]

Received By: _____
Signing this Notice is not an admission of guilt
AGCS2M000534

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

February 18, 1999

Elizabeth Gilpin
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle WA 98101-2038

Dear Ms. Gilpin:

Re: Notice of Violation # 36725

The following is further information as you requested on the excess NO_x emissions reported in our CEM from November, 1998. We hope this is adequate.

NO_x Emissions:

November 03, 1998:

As reported, both of the coal mills were shut down for maintenance. We were forced to switch the primary fuel to gas. With 95% gas and the chemistry of our kiln feed configured for coal, we were unable to control the NO_x. This was necessary maintenance as our coal mills weren't able to maintain a proper operating time (due to mechanical problems) to supply enough coal at a proper fineness to the kiln. This incident should be excused from penalty under WAC 173-400-107 (5).

This shutdown was planned so that a consultant could inspect our coal mills to increase operating time and improve the quality. If we increased the operating time, we could decrease the number of time we have to switch to gas unexpectedly. Increasing the quality would improve the flame shape out of our main burner and could reduce both Carbon Monoxide and NO_x emissions through increased stability of our kiln. During the outage we replaced the bowl liners of one mill and replaced the rotary feeder / airlock for the other. Through these changes and continued PM. We hope to improve their operations. It was necessary to schedule the inspections and maintenance of the mills both on this day as was dictated by the consultant's schedule. It could not have been scheduled in any other way. The design of these mills is industry standard and is not inadequate and we perform routine Preventive Maintenance to ensure their operation. We feel that we should be excused from penalty under WAC 173-400-107 (5).

November 12, 1998:

We switched to full gas to perform maintenance on our powdered coal feeder. This was necessary maintenance as the feeder had been controlling poorly and had the potential to create combustibles. While we were on gas we were unable to control the NO_x. The operator as in the case above had a raw feed mix designed to be burned with coal. Without the addition of coal ash to the mix, it by nature produces more NO_x. The operator through stabilization of the kiln attempted to control the emissions.

Our powdered fuel feeder was running at a constant speed and was not making the necessary adjustments to maintain its flow at a constant rate. There were swings in the flow rate of up to 50%. This caused fluctuations in our CO emissions and made the kiln operation very unstable. It was absolutely necessary to shut the feeder down for maintenance at this time. During the maintenance, it was found that a limit switch which controls the feeders automatic cleaning cycle had moved and the feeder was locked into its cleaning mode (this locks the feeder into a constant speed). The limit switch was fixed and the feeder restarted. As this was a new problem, those involved in the maintenance and operation of this feeder were trained on

recognizing and fixing this problem. We feel that the failure of this limit switch could not have been reasonable avoided. This was not a problem caused by improper operation or maintenance. The event is not of a recurring nature as it is the first time this limit switch has failed in its seven years of operation and the operator did what was in their power to minimize the emissions. Thus we feel that this event should be excused from penalty under WAS173-400-107(6).

November 27, 1998:

A valve which divides the feed to the kiln between the top stage and the second stage had an electrical failure and moved on its own. This caused the feed to be diverted to the second stage heating up the kiln and creating NO_x. The valve was disconnected from its drive and manually set back in the correct position. This is the first incident of its kind in the seven years the plant has been operating. To prevent an incident in the future, the drive was repaired. This incident should be excused from penalty under WAC 173-400-107 (6). The scheduling of the maintenance was necessary and the event was not caused by poor operation, design or maintenance.

This splitter gate is not used. It actually has not been moved in the seven years the kiln has operated. To ensure that this does not happen in the future, it was disconnected electrically and mechanically locked into place.

Sincerely,

J. Trygve Grey
Process Engineer

PUGET SOUND AIR POLLUTION CONTROL AGENCY RECEIVED

110 Union Street, Suite 500, Seattle, Washington 98101-2038

Fax: 206-343-7522

FEB - 4 1999

CERT NO. Z 580 038 842

Registration No. 11339

AGCW-SEATTLE

Case No. _____]

COMPLIANCE STATUS REPORT

Date of Report November, 19 99 at _____ .m.

Source Name <u>Ash Grove Cement</u>	Responsible Person, Title <u>Henrik Voldbaek, Plant Mgr</u>
Location <u>3801 E. Marginal Wy S.</u> <u>Seattle, WA 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☒ During my inspection ^{of 11/98 CEM report} I noted the following deficiencies:

Date	Pollutant	Regulation
<u>11/8/98</u>	<u>CO</u>	<u>N/C 7381 #5a</u>
<u>11/2/98</u>	<u>Opacity</u>	<u>Reg I Sect. 9.04 (c)(1) + (2)</u>

This determination is based on the 9/10/98
interim CEM policy which has not been Board
approved & is subject to change.
Response provided in CEM report.

~~Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.~~

Issued by: _____

2.3.99

Received by _____

Signing this is not an admission of guilt